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March 7, 2013

VIA ELECTRONIC FILING

Hon. Peter G. Sheridan, U.S.D.J
Clarkson S. Fisher P.O. & Federal Courthouse
402 East State Street
Trenton, New Jersey 08608

Re: State Troopers Fraternal Assoc., Inc., v State
Dkt. No. 3:13-cv-1065 (PGS)

Dear Judge Sheridan,

I represent the State of New Jersey and the Superintendent of State Police, Colonel Joseph Fuentes, in the above referenced matter. This matter was brought to the Court's attention by way of an Order to Show Cause and Verified Complaint filed by the State Troopers Fraternal Association (STFA). The Court conducted a hearing on the STFA's request for a temporary restraining order on February 22, 2013. At that time, the Court denied that application but issued other orders including, but not limited to, setting a return date on the Order to Show Cause for March 12, 2013 and requiring any opposition thereto to be submitted by March 7, 2013. This correspondence is for the purpose of requesting the Court's consent to adjourn those dates for a period of thirty (30) days.

On February 26, 2013, Christopher Burgos, President of the STFA, appeared for the interview demanded by the Division of State Police and a court reporter was present to record the interview, as ordered by the Court. A transcript of the interview has been provided to all parties. During the interview, President Burgos responded to questions posed to him. However, as a result of some of those answers, a formal order



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was issued by the State Police for the production of certain material identified by Burgos. That process has begun but has not yet been completed. The parties are working towards that completion and neither the STFA nor President Burgos has waived any of the privileges asserted in the Order to Show Cause or Verified Complaint in responding to the Division's order.

However, it is uncertain at this time if the response to that order, or any other order issued by the Division in conjunction with the testimony given at the interview, will generate other or additional issues that the Court should consider as part of the pending application or any opposition thereto on behalf of these defendants. Because of that possibility, and in order to address these issues at one time, rather than piecemeal, counsel have agreed to make this application to the Court to adjourn both the return date on the application for the injunction and any opposition thereto, be adjourned for a period of thirty (30) days.

Accordingly, with the consent of all parties, this adjournment is respectfully requested from the Court.

Respectfully submitted,

JEFFREY S. CHIESA
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Vincent J. Rizzo, Jr.
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cc: Merick H. Limsky, Esq.
Michael A. Bukosky, Esq.